

SEALED

KSC/02.01.24
AOA: USAO #2023R00384

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND**

UNITED STATES OF AMERICA

v.

**VACSHON BROWN,
a/k/a "Vash,"**

**AARON MCNEIL
a/k/a "Skeeta,"**

and

**ROBERT STEWART,
a/k/a "Lil' Man,"**

Defendants.

UNDER SEAL

CRIMINAL NO.

JKB 24 cr 35

(Conspiracy to Distribute and Possess
with Intent to Distribute Controlled
Substances, 21 U.S.C. § 846; Possession
with Intent to Distribute Controlled
Substances, 21 U.S.C. § 841; Possession
of a Firearm and Ammunition by a
Prohibited Person, 18 U.S.C. § 922(g);
Possession of a Firearm in Furtherance
of a Drug Trafficking Crime, 18 U.S.C.
§ 924(c); Conspiracy to Commit Money
Laundering, 18 U.S.C. § 1956(h);
Money Laundering, 18 U.S.C. § 1956(a);
Forfeiture, 18 U.S.C. §§ 924(d) and
982(a)(1) and (b)(1), 21 U.S.C. § 853, 28
U.S.C. § 2461)

INDICTMENT

COUNT ONE

(Conspiracy to Possess with Intent to Distribute Controlled Substances)

The Grand Jury for the District of Maryland charges that:

From in or about January 2022, and continuing through in or about July 27, 2023, in the

District of Maryland and elsewhere,

**VACSHON BROWN,
a/k/a "Vash,"**

**AARON MCNEIL,
a/k/a "Skeeta,"**

and

**ROBERT STEWART,
a/k/a "Lil' Man,"**

USDC - BALTIMORE
24 FEB 7 PM 7:25

the defendants herein, did knowingly, willfully and unlawfully combine, conspire, confederate, and agree with each other and with others known and unknown to the Grand Jury to knowingly, intentionally, and unlawfully distribute and possess with intent to distribute 400 grams or more of a quantity of a mixture or substance containing a detectable amount of N-phenyl-N-[1-(2-phenylethyl)-4-piperidinyl] propanamide, commonly known as fentanyl, a Schedule II controlled substance, 500 grams or more of a mixture or substance containing a detectable amount of cocaine, a Schedule II controlled substance, and 280 grams or more of a mixture or substance containing a detectable amount of cocaine base, a Schedule II controlled substance, in violation of Title 21, United States Code Section 841(a)(1).

21 U.S.C. § 846

COUNT TWO

(Possession with the Intent to Distribute Controlled Substances)

The Grand Jury for the District of Maryland further charges that:

On or about July 27, 2023, in the District of Maryland, the Defendant,

**VACSHON BROWN,
a/k/a “Vash,”**

did knowingly and intentionally possess with the intent to distribute 400 grams or more of a quantity of a mixture or substance containing a detectable amount of N-phenyl-N-[1-(2-phenylethyl)-4-piperidinyl] propanamide, commonly known as fentanyl, a Schedule II controlled substance, 500 grams or more of a mixture or substance containing a detectable amount of cocaine, a Schedule II controlled substance, and 280 grams or more of a mixture or substance containing a detectable amount of cocaine base, a Schedule II controlled substance, in violation of Title 21, United States Code Section 841(a)(1).

21 U.S.C. § 841(a)

21 U.S.C. § 841(b)(1)(A)

21 U.S.C. § 841(b)(1)(B)

COUNT THREE
(Possession of a Firearm by a Prohibited Person)

The Grand Jury for the District of Maryland further charges that:

On or about July 27, 2023, in the District of Maryland, the defendant,

VACSHON BROWN,
a/k/a “Vash,”

knowing he had previously been convicted of a crime punishable by imprisonment for a term exceeding one year, knowingly possessed firearms and ammunition—that is a:

Ruger 5.7 semi-automatic pistol (serial number 641-95556);

Taurus PT738TCP, .380 caliber semi-automatic pistol (serial number 52806E);

Glock 22, .40 caliber loaded semi-automatic pistol (serial number AUL877US);

Ruger SR40c, .40 caliber loaded semi-automatic pistol (obliterated serial number);

Smith and Wesson M&P 45, .45 caliber loaded semi-automatic pistol (serial number HST6669);

Scott’s Tactical Supply M4, .300 AAC Blackout caliber semi-automatic pistol equipped with a suppressor (serial number STSR00104);

Maverick Arms 88, 20-gauge caliber pump action shotgun (serial number MV0756146);

Radical Firearms LLC RF-15, 5.56x45mm caliber semi-automatic rifle equipped with a fixed flash suppressor (serial number 2-001664);

Mossberg Of 590A1, 12-gauge caliber pump action shotgun (serial number U024844);

Sig-Sauer P938, 9mm Luger caliber loaded semi-automatic pistol (serial number 52B293690);

73 rounds of .40 S&W ammunition;

26 rounds .45 Auto ammunition;

85 rounds of 9mm Luger ammunition;

12 rounds of .380 Auto ammunition; and

218 rounds of 5.7x28mm ammunition;

and the firearms and ammunition were in and affecting commerce.

18 U.S.C. § 922(g)(1)

COUNT FOUR
(Possession of a Firearm in Furtherance of a Drug Trafficking Crime)

The Grand Jury for the District of Maryland further charges that:

On or about July 27, 2023, in the District of Maryland, the Defendant,

VACSHON BROWN,
a/k/a “Vash,”

did knowingly possess a firearm, to wit, a Sig-Sauer P938, 9mm Luger caliber, semi-automatic pistol (serial number 52B293690), in furtherance of a drug trafficking crime for which he may be prosecuted in a court of the United States, that is, possession with the intent to distribute a controlled substance, in violation of Title 21, United States Code, Section 841(a), as alleged in Count Two of this Indictment.

18 U.S.C. § 924(c)(1)(A)

COUNT FIVE
(Conspiracy to Commit Money Laundering)

The Grand Jury for the District of Maryland further charges that:

From in or about June 30, 2022, and continuing through in or about July 13, 2022, in the District of Maryland and elsewhere, the defendants,

VACSHON BROWN,
a/k/a “Vash,”
and
AARON MCNEIL,
a/k/a “Skeeta,”

did knowingly combine, conspire, and agree with each other and with other persons known and unknown to the Grand Jury to commit offenses against the United States in violation of Title 18, United States Code, Section 1956 and Section 1957, to wit, to knowingly conduct and attempt to conduct financial transactions affecting interstate commerce and foreign commerce, which transactions involved the proceeds of specified unlawful activity, that is, by obtaining cashier's checks from various financial institutions and depositing U.S. currency into an A1 Trucking Global Enterprise, LLC Navy Federal Credit Union account (x7910), for which the defendant Brown is the signatory, and subsequently using the same funds to make a vehicle purchase, knowing that the transactions were designed in whole or in part to conceal and disguise the nature, location, source, ownership, and control of the proceeds of specified unlawful activity, and that while conducting and attempting to conduct such financial transactions, knew that the property involved in the financial transactions represented the proceeds of some form of unlawful activity, in violation of Title 18, United States Code, Section 1956(a)(1)(B)(i).

18 U.S.C. § 1956(h)
18 U.S.C. § 2

COUNT SIX
(Concealment Money Laundering)

The Grand Jury for the District of Maryland further charges that:

From in or about May 3, 2023, and continuing through in or about May 8, 2023, in the District of Maryland, the defendant,

VACSHON BROWN,
a/k/a "Vash,"

did knowingly conduct and attempt to conduct a financial transaction affecting interstate commerce, by depositing U.S. currency into a VB Properties, LLC Navy Federal Credit Union account (x9050), for which the defendant is the signatory, and transferring those funds to a third party's Navy Federal Credit Union account (x7848) to make an earnest money deposit for a real estate purchase, which in fact involved the proceeds of specified unlawful activity, that is, distribution of a controlled substance in violation of 21 U.S.C. § 841(a), knowing that the property involved in the financial transaction represented the proceeds of some form of unlawful activity and that the transaction was designed in whole and in part to conceal and disguise the nature, location, source, ownership, and control of the proceeds of specified unlawful activity.

18 U.S.C. § 1956(a)(1)(B)(i)
18 U.S.C. § 2

COUNT SEVEN
(Promotion Money Laundering)

The Grand Jury for the District of Maryland further charges:

On or about October 3, 2022, in the District of Maryland, the defendant,

VACSHON BROWN,
a/k/a “Vash,”

did knowingly conduct the following financial transaction affecting interstate and foreign commerce, specifically, depositing U.S. currency in his Bank of America account (x3675) that was subsequently used to make an apartment rent payment, which involved the proceeds of specified unlawful activity, that is, felonious distribution of controlled substances in violation of 21 U.S.C. § 841, with the intent to promote the carrying on of such specified unlawful activity, specifically to purchase illegal drugs for subsequent distribution, and while conducting the financial transaction knew the property involved in the financial transaction represented the proceeds of some form of unlawful activity.

18 U.S.C. § 1956(a)(1)(A)(i)
18 U.S.C. § 2

COUNT EIGHT
(Promotion Money Laundering)

The Grand Jury for the District of Maryland further charges:

On or about November 7, 2022, in the District of Maryland, the defendant,

VACSHON BROWN,
a/k/a "Vash,"

did knowingly conduct the following financial transaction affecting interstate and foreign commerce, specifically, depositing U.S. currency in his Bank of America account (x3675) that was subsequently used to make an apartment rent payment, which involved the proceeds of specified unlawful activity, that is, felonious distribution of controlled substances in violation of 21 U.S.C. § 841, with the intent to promote the carrying on of such specified unlawful activity, specifically to purchase illegal drugs for subsequent distribution, and while conducting the financial transaction knew the property involved in the financial transaction represented the proceeds of some form of unlawful activity.

18 U.S.C. § 1956(a)(1)(A)(i)
18 U.S.C. § 2

COUNT NINE
(Promotion Money Laundering)

The Grand Jury for the District of Maryland further charges:

On or about December 5, 2022, in the District of Maryland, the defendant,

VACSHON BROWN,
a/k/a “Vash,”

did knowingly conduct the following financial transaction affecting interstate and foreign commerce, specifically, depositing U.S. currency in his Bank of America account (x3675) that was subsequently used to make an apartment rent payment, which involved the proceeds of specified unlawful activity, that is, felonious distribution of controlled substances in violation of 21 U.S.C. § 841, with the intent to promote the carrying on of such specified unlawful activity, specifically to purchase illegal drugs for subsequent distribution, and while conducting the financial transaction knew the property involved in the financial transaction represented the proceeds of some form of unlawful activity.

18 U.S.C. § 1956(a)(1)(A)(i)
18 U.S.C. § 2

COUNT TEN

(Possession with the Intent to Distribute Controlled Substances)

The Grand Jury for the District of Maryland further charges that:

On or about July 27, 2023, in the District of Maryland, the Defendant,

**AARON MCNEIL,
a/k/a "Skeeta,"**

did knowingly and intentionally possess with the intent to distribute a mixture or substance containing a detectable amount of N-phenyl-N-[1-(2-phenyl-ethyl)-4-piperidinyl] propanamide, commonly known as fentanyl, a Schedule II controlled substance, in violation of Title 21, United States Code Section 841(a)(1).

21 U.S.C. § 841(a)

21 U.S.C. § 841(b)(1)(C)

COUNT ELEVEN
(Possession of a Firearm by a Prohibited Person)

The Grand Jury for the District of Maryland further charges that:

On or about July 27, 2023, in the District of Maryland, the defendant,

AARON MCNEIL,
a/k/a “Skeeta,”

knowing he had previously been convicted of a crime punishable by imprisonment for a term exceeding one year, knowingly possessed firearms and ammunition—that is a Smith & Wesson Model 36, .38 caliber loaded special revolver (serial number 187745) and the firearm and ammunition were in and affecting commerce.

18 U.S.C. § 922(g)(1)

COUNT TWELVE

(Possession of a Firearm in Furtherance of a Drug Trafficking Crime)

The Grand Jury for the District of Maryland further charges that:

On or about July 27, 2023, in the District of Maryland, the Defendant,

**AARON MCNEIL,
a/k/a "Skeeta,"**

did knowingly possess a firearm, to wit, a Smith & Wesson 36, .38 caliber loaded special revolver (serial number 187745), in furtherance of a drug trafficking crime for which he may be prosecuted in a court of the United States, that is, possession with the intent to distribute a controlled substance, in violation of Title 21, United States Code, Section 841(a), as alleged in Count Eleven of this Indictment.

18 U.S.C. § 924(c)(1)(A)

COUNT THIRTEEN

(Possession with the Intent to Distribute Controlled Substances)

The Grand Jury for the District of Maryland further charges that:

On or about May 16, 2023, in the District of Maryland, the Defendant,

**ROBERT STEWART,
a/k/a "Lil' Man,"**

did knowingly and intentionally possess with the intent to distribute a mixture or substance containing a detectable amount of N-phenyl-N-[1-(2-phenyl-ethyl)-4-piperidinyl] propanamide, commonly known as fentanyl, a Schedule II controlled substance, in violation of Title 21, United States Code Section 841(a)(1).

21 U.S.C. § 841(a)

21 U.S.C. § 841(b)(1)(C)

FORFEITURE

The Grand Jury for the District of Maryland further finds that:

1. Pursuant to Fed. R. Crim. P. 32.2, notice is hereby given to the Defendants that the United States will seek forfeiture as part of any sentence in accordance with 18 U.S.C. §§ 924(d) and 982(a)(1) and (b)(1), 21 U.S.C. § 853, and 28 U.S.C. § 2461(c), in the event of the Defendants' convictions under Counts One through Fourteen of this Indictment.

Narcotics Forfeiture

2. Upon conviction of the offense(s) alleged in Counts One, Two, Ten, or Thirteen of this Indictment, the Defendants,

**VACSHON BROWN,
a/k/a "Vash,"
AARON MCNEIL,
a/k/a "Skeeta,"
and
ROBERT STEWART,
a/k/a "Lil' Man,"**

shall forfeit to the United States, pursuant to 21 U.S.C. § 853(a):

- a. any property constituting, or derived from, any proceeds obtained, directly or indirectly, as a result of such offense(s); and
- b. any property used, or intended to be used, in any manner or part, to commit, or facilitate the commission of, such offense(s).

Firearms and Ammunition Forfeiture

3. Upon conviction of the offense(s) alleged in Counts Three, Four, Eleven, or Twelve of this Indictment, the Defendants,

**VACSHON BROWN,
a/k/a "Vash,"
and
AARON MCNEIL,
a/k/a "Skeeta,"**

shall forfeit to the United States, pursuant to 18 U.S.C. § 924(d) and 28 U.S.C. § 2461(c), any firearms and ammunition involved in such offense(s).

Money Laundering Forfeiture

4. Upon conviction of the offense(s) alleged in Counts Five through Nine of this Indictment, the defendants,

**VACSHON BROWN,
a/k/a "Vash,"
and
AARON MCNEIL,
a/k/a "Skeeta,"**

shall forfeit to the United States, pursuant to 18 U.S.C. § 982(a)(1), any property, real or personal, involved in such offenses, or any property traceable to such property.

Property Subject to Forfeiture

5. The property to be forfeited includes, but is not limited to, the following:
- a. approximately \$108,405 in U.S. currency seized from Vacshon Brown's residence in Abingdon, Maryland on or around July 27, 2023;
 - b. a white-gold chain with diamonds and a tri-color gold money bag pendant seized from Vacshon Brown's residence in Abingdon, Maryland on or around July 27, 2023;
 - c. a white-gold diamond heart pendant seized from Vacshon Brown's residence in Abingdon, Maryland on or around July 27, 2023;
 - d. a platinum diamond wedding band seized from Vacshon Brown's residence in Abingdon, Maryland on or around July 27, 2023;
 - e. a yellow-gold diamond wedding band seized from Vacshon Brown's residence in Abingdon, Maryland on or around July 27, 2023;
 - f. a stainless steel and white-gold Rolex watch seized from Vacshon Brown's residence in Abingdon, Maryland on or around July 27, 2023;
 - g. a yellow-gold Rolex watch seized from Vacshon Brown's residence in Abingdon, Maryland on or around July 27, 2023;
 - h. a stainless steel and white-gold Rolex watch seized from Vacshon Brown's residence in Abingdon, Maryland on or around July 27, 2023;

- i. a stainless steel and yellow-gold Rolex watch seized from Vacshon Brown's residence in Abingdon, Maryland on or around July 27, 2023;
- j. a Ruger 5.7 semi-automatic pistol bearing serial number 641-95556, and a magazine containing approximately 21 rounds of ammunition loaded therein, seized from Vacshon Brown's residence in Abingdon, Maryland on or around July 27, 2023;
- k. a Polymer 80 semi-automatic pistol bearing no serial number, and a magazine containing approximately 10 rounds of ammunition loaded therein, seized from Vacshon Brown's residence in Abingdon, Maryland on or around July 27, 2023;
- l. a Sig-Sauer P938 9mm Luger semi-automatic pistol bearing serial number 52B293690, and a magazine containing approximately six cartridges of 9mm ammunition loaded therein, seized from Vacshon Brown's rental apartment at 201 S. Conkling St., Baltimore, MD 21224 on or around July 27, 2023;
- m. a dark Polymer80 Inc PF940C, 9mm semi-automatic pistol bearing no serial number, and a magazine containing approximately 15 rounds of 9mm ammunition loaded therein, seized from Vacshon Brown's property at 1709 E. 33rd Street, Baltimore, Maryland on or around July 27, 2023;
- n. a Taurus PT738TCP, .380 caliber semi-automatic pistol bearing serial number 52806E, and a magazine containing approximately six rounds of .380 caliber ammunition loaded therein, seized from Vacshon Brown's property at 1709 E. 33rd Street, Baltimore, Maryland on or around July 27, 2023;
- o. a Glock 22, .40 caliber semi-automatic pistol bearing serial number AUL877US, and a magazine containing approximately 14 rounds of .40 caliber ammunition loaded therein, seized from Vacshon Brown's property at 1709 E. 33rd Street, Baltimore, Maryland on or around July 27, 2023;
- p. a Ruger SR40c, .40 caliber semi-automatic pistol with an obliterated serial number, and a magazine containing approximately 15 rounds of .40 caliber ammunition loaded therein, seized from Vacshon Brown's property at 1709 E. 33rd Street, Baltimore, Maryland on or around July 27, 2023;
- q. a Smith and Wesson M&P 45, .45 caliber semi-automatic pistol bearing serial number HST6669, and a magazine containing approximately eight rounds of .45-caliber ammunition loaded therein, seized from Vacshon Brown's property at 1709 E. 33rd Street, Baltimore, Maryland on or around July 27, 2023;
- r. a Scott's Tactical Supply M4, .300 AAC Blackout caliber semi-automatic pistol bearing serial number STSR00104, and a suppressor attached thereto, seized from Vacshon Brown's property at 1709 E. 33rd Street, Baltimore, Maryland on or around July 27, 2023;

- s. a Maverick Arms 88 20-gauge pump-action shotgun bearing serial number MV0756146 seized from Vacshon Brown's property at E. 1709 33rd Street, Baltimore, Maryland on or around July 27, 2023;
- t. a Radical Firearms LLC RF-15, 5.56x45mm caliber semi-automatic rifle bearing serial number 2-001664, and a fixed flash suppressor attached thereto, seized from Vacshon Brown's property at 1709 E. 33rd Street, Baltimore, Maryland on or around July 27, 2023;
- u. a Polymer80 PF940V2, 9mm semi-automatic pistol bearing no serial number seized from Vacshon Brown's property at 1709 E. 33rd Street, Baltimore, Maryland on or around July 27, 2023;
- v. a Polymer80 PF940C, 9mm caliber semi-automatic pistol bearing no serial number, and approximately one round of 9mm ammunition loaded therein, seized from Vacshon Brown's property at 1709 E. 33rd Street, Baltimore, Maryland on or around July 27, 2023;
- w. a Mossberg Of 590A1 12-gauge pump-action shotgun bearing serial number U024844 seized from Vacshon Brown's property at 1709 E. 33rd Street, Baltimore, Maryland on or around July 27, 2023;
- x. approximately 30 12-gauge shotgun cartridges seized from Vacshon Brown's property at 1709 E. 33rd Street, Baltimore, Maryland on or around July 27, 2023;
- y. approximately 40 rounds of 9mm ammunition seized from Vacshon Brown's property at 1709 E. 33rd Street, Baltimore, Maryland on or around July 27, 2023;
- z. approximately 41 rounds of .40 caliber ammunition seized from Vacshon Brown's property at 1709 E. 33rd Street, Baltimore, Maryland on or around July 27, 2023;
- aa. approximately 20 rounds of .223 caliber ammunition seized from Vacshon Brown's property at 1709 E. 33rd Street, Baltimore, Maryland on or around July 27, 2023;
- bb. approximately 200 rounds of 5.7x28mm ammunition seized from Vacshon Brown's rental apartment at 201 S. Conkling St., Baltimore, MD 21224 on or around July 27, 2023;
- cc. a Smith & Wesson 36, .38 special revolver bearing serial number 187745, and approximately four rounds of .38 caliber ammunition loaded therein seized from Aaron McNeil's residence at 1221 N. Patterson Park Ave., Baltimore, Maryland on or around July 27, 2023; and
- dd. the real property located at 1709 East E. 33rd Street, Baltimore, MD 21218.

Substitute Assets

6. If, as a result of any act or omission by the Defendants, any of the property described above as being subject to forfeiture:

- a. cannot be located upon the exercise of due diligence;
- b. has been transferred or sold to, or deposited with, a third person;
- c. has been placed beyond the jurisdiction of the Court;
- d. has been substantially diminished in value; or
- e. has been commingled with other property which cannot be divided without difficulty,

the United States shall be entitled to forfeiture of substitute property up to the value of the forfeitable property pursuant to 21 U.S.C. § 853(p), as incorporated by 28 U.S.C. § 2461(c).

18 U.S.C. § 924(d)
18 U.S.C. § 982(a)(1) and (b)(1)
21 U.S.C. § 853
28 U.S.C. § 2461(c)

Erek L. Barron / AA
Erek L. Barron
United States Attorney

A TRUE BILL

Foreperson **SIGNATURE REDACTED**
Date: 2/7/24